

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

Special Master: David T. Moran

**UNOPPOSED MOTION TO FILE UNDER SEAL**

Plaintiff States (“States”) respectfully move the Court for leave to file under seal Exhibit E to PLAINTIFF STATES’ OPPOSITION TO GOOGLE’S MOTION TO CLARIFY THE SCHEDULING ORDER TO PROVIDE FOR POTENTIAL POST-TRIAL PROCEEDINGS ON INJUNCTIVE RELIEF (“Exhibit E”), to be filed later today. The States’ Opposition itself and other exhibits will be publicly filed and not sealed. Defendant Google LLC (“Google”) does not oppose the States’ sealing request.

The States, with Google’s consent, request to file under seal Exhibit E because: Exhibit E is an expert report disclosed by the States that quotes and discusses documents and depositions that Google and third parties have designated confidential or highly confidential as containing identities of individual employees and/or competitively sensitive information. Consistent with Local Rule CV-5, the States will work with Google to file a redacted version—with as limited redactions as possible—of the above-referenced documents within seven (7) days.

For the reasons stated above, the States respectfully request that this Court allow the States to file the above-referenced document under seal.

Dated: July 19, 2024.

Respectfully submitted,

/s/ W. Mark Lanier

W. Mark Lanier

[Mark.Lanier@LanierLawFirm.com](mailto:Mark.Lanier@LanierLawFirm.com)

Alex J. Brown

[Alex.Brown@LanierLawFirm.com](mailto:Alex.Brown@LanierLawFirm.com)

Zeke DeRose III

[Zeke.DeRose@LanierLawFirm.com](mailto:Zeke.DeRose@LanierLawFirm.com)

Jonathan P. Wilkerson

[Jonathan.Wilkerson@LanierLawFirm.com](mailto:Jonathan.Wilkerson@LanierLawFirm.com)

10940 W. Sam Houston Pkwy N

Suite 100

Houston, TX 77064

(713) 659-5200

**THE LANIER LAW FIRM, PLLC**

/s/ Ashley Keller

Ashley Keller

[ack@kellerpostman.com](mailto:ack@kellerpostman.com)

150 N. Riverside Plaza, Suite 4100

Chicago, Illinois 60606

(312) 741-5220

Zina Bash

[zina.bash@kellerpostman.com](mailto:zina.bash@kellerpostman.com)

111 Congress Avenue, Suite 500

Austin, TX 78701

(512) 690-0990

Noah S. Heinz

[noah.heinz@kellerpostman.com](mailto:noah.heinz@kellerpostman.com)

1101 Connecticut, N.W., 11th Floor

Washington, DC 20005

(202) 918-1123

**KELLER POSTMAN LLC**

*Counsel for Texas, Idaho, Louisiana (The Lanier Law Firm only), Indiana, Mississippi, North Dakota, South Carolina, and South Dakota*

*Submitted on behalf of all Plaintiff States*

**NORTON ROSE FULBRIGHT US LLP**

Joseph M. Graham, Jr.  
joseph.graham@nortonrosefulbright.com  
Geraldine Young  
geraldine.young@nortonrosefulbright.com  
1301 McKinney, Suite 5100  
Houston, Texas 77010  
(713) 651-5151

Marc B. Collier  
Marc.Collier@nortonrosefulbright.com  
98 San Jacinto Blvd., Suite 1100  
Austin, Texas 78701  
(512) 474-5201

FOR PLAINTIFF STATE OF TEXAS:

KEN PAXTON  
Attorney General

/s/ Trevor E. D. Young

Brent Webster, First Assistant Attorney General of Texas  
[Brent.Webster@oag.texas.gov](mailto:Brent.Webster@oag.texas.gov)  
James R. Lloyd, Deputy Attorney General for Civil Litigation  
[James.Lloyd@oag.texas.gov](mailto:James.Lloyd@oag.texas.gov)  
Trevor Young, Deputy Chief, Antitrust Division  
[Trevor.Young@oag.texas.gov](mailto:Trevor.Young@oag.texas.gov)

**STATE OF TEXAS, OFFICE OF THE ATTORNEY GENERAL**  
P.O. Box 12548  
Austin, TX 78711-2548  
(512) 936-1674

*Attorneys for Plaintiff State of Texas*

**CERTIFICATION OF CONFERENCE**

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that Google LLC does not oppose the foregoing sealing request.

/s/ Geraldine Young  
Geraldine Young

**CERTIFICATE OF SERVICE**

I certify that on July 19, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Geraldine Young  
Geraldine Young